

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
3 David A. Perlson (Bar No. 209502)
davidperlson@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
5 John Neukom (Bar No. 275887)
johnneukom@quinnemanuel.com
6 Jordan Jaffe (Bar No. 254886)
jordanjaffe@quinnemanuel.com
7 50 California Street, 22nd Floor
San Francisco, California 94111-4788
8 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

9
10 Attorneys for WAYMO LLC

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 CASE NO. 3:17-cv-00939-WHA

15 Plaintiff,

16 **DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
RESPONSE TO PRECIS**

17 vs.

18 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

19 Defendants.

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion
 7 to File Under Seal Portions of Its Response to Precis (the “Administrative Motion”). The
 8 Administrative Motion seeks an order sealing highlighted portions of Otto Trucking’s Response to
 9 Waymo’s Precis (“Otto Trucking’s Response”) and of Exhibits 2, 5, and 8 to the Vu Declaration, as
 10 well as the entirety of Exhibits 3-4 and 6 to the Vu Declaration.

11 3. The portions of Otto Trucking’s Response marked in red boxes, the green highlighted
 12 portions of Exhibits 2 and 4, the entirety of Exhibit 6, and the yellow highlighted portions of Exhibit 8
 13 contain or refer to confidential business information, which Waymo seeks to seal.

14 4. Otto Trucking’s Response (portions marked in red boxes in version filed herewith),
 15 Exhibit 4 (portions highlighted in green in version filed herewith), Exhibit 6 (entire document), and
 16 Exhibit 8 (yellow highlighted portions) further contain, reference, and/or describe Waymo’s highly
 17 confidential and sensitive business information. Such information includes details regarding
 18 Waymo’s confidential strategy related to Anthony Levandowski’s departure, executive compensation,
 19 and Waymo’s approach to LiDAR design. I understand that Waymo maintains that this information
 20 as confidential. The public disclosure of this information would cause significant competitive harm to
 21 Waymo, as its confidential business and technical strategy would become known to competitors who
 22 could use such information to Waymo’s disadvantage. In addition, Exhibit 4 (portions highlighted in
 23 green in version filed herewith) contain email addresses and/or phone numbers of Waymo employees
 24 and former employees involved in this case, the disclosure of which would cause Waymo and those
 25 employees substantial harm due to the high public profile of this litigation. Exhibit 6 (entire
 26 document) additionally contains details regarding Anthony Levandowski’s compensation and payroll,
 27 which Waymo maintains as confidential

28

1 5. Exhibit 2 (red highlighted portions) contains, discusses, or refers to confidential details
2 regarding the corporate ownership, corporate leadership, business models, prototype development and
3 testing, and employee recruitment efforts, which Waymo understands are highly confidential to Kitty
4 Hawk, and disclosure of such information would inflict serious and irreparable damage to Kitty
5 Hawk's business. (See Dkt No. 1115 ¶ 3.)

6 6. Waymo's request to seal is narrowly tailored to those portions of Otto Trucking's
7 Response and Exhibits 2, 4, 6, and 8 that merit sealing.

8
9 I declare under penalty of perjury under the laws of the State of California and the United
10 States of America that the foregoing is true and correct, and that this declaration was executed in San
11 Francisco, California, on August 28, 2017.

12 By /s/ Felipe Corredor
13 Felipe Corredor
14 Attorneys for WAYMO LLC

15
16 **ATTESTATION**

17 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
18 document has been obtained from Felipe Corredor.

19
20 By: /s/ Charles K. Verhoeven
21 Charles K. Verhoeven